

1. /027/007

DAVIS, GRAHAM & STUBBS

ATTORNEYS AT LAW

WASHINGTON D.C. OFFICE

SUITE 500
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2402
TELEPHONE 202-822-8660

SUITE 4700
370 SEVENTEENTH STREET

DENVER, COLORADO 80202

MAILING ADDRESS
POST OFFICE BOX 185

DENVER, COLORADO 80201-0185

TELEPHONE 303-892-9400
FACSIMILE 303-893-1379

TELEX 413726 DGS DVR UD
CABLE DAVGRAM, DENVER

SALT LAKE CITY OFFICE

SUITE 1600-87
EAGLE GATE TOWER
60 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111-1006
TELEPHONE 801-328-6000

RICHARD A. WESTFALL
303-892-7498

June 7, 1991

Mr. Holland Shepherd
Senior Reclamation Specialist
Utah Division of Oil, Gas & Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, UT 84180

RECEIVED

JUN 10 1991

DIVISION OF
OIL GAS & MINING

Re: Revegetation and Topsoil Deficiency at Drum Mine,
M/027/007, Millard County, Utah

Dear Mr. Shepherd:

This letter is in response to your letter of May 30, 1990, to Dwight Crossland of Western States. That letter responds to the soil analysis submitted by Frank Filas of Western States in April of 1990.

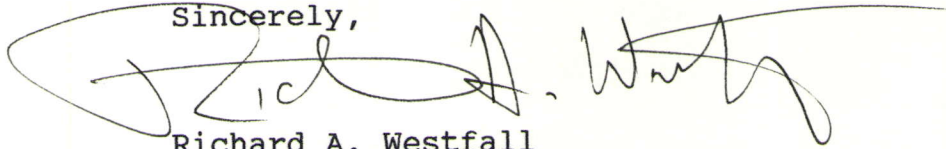
Western States remains willing to continue a technical dialogue with the Division on reclamation issues pending the outcome of the litigation between Western States and Jumbo Mining Co., the present owner of the Drum Mine. As you know, Mr. Filas no longer works with Western States and Mr. Crossland is handling technical issues related to the Drum Mine on an interim basis. Western States is, however, presently evaluating how it will handle technical issues like the one discussed in your letter given Mr. Filas' departure.

Western States would like to schedule a meeting with you sometime in July or August to discuss the soil analysis issue and the need for any additional testing. This should give Western States time to determine how it will handle technical reclamation issues on a more permanent basis.

June 7, 1991
Page 2

Please call me if you have any questions. In the meantime, I understand that Mr. Crossland will contact you on an informal basis in the near future.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Richard A. Westfall', with a large, sweeping flourish extending to the right.

Richard A. Westfall
for

DAVIS, GRAHAM & STUBBS

RAW/jlw

cc: Al Cerny, WSMC
Dwight Crossland, WSMC
Steve Clyde for Ed King, Jumbo Mining
Lowell Braxton, DOGM
Wayne Hedberg, DOGM